

**From:** [Lancey, Susan](#)  
**To:** [Beahm, Catherine](#)  
**Cc:** [Moore, Todd](#)  
**Subject:** FW: Pyrolysis Oil  
**Date:** Wednesday, November 20, 2013 4:52:00 PM

---

Hi Cathy,

Please see the information below from our regional RCRA contact about your questions. If you have any follow-up questions, please contact Jui-Yu. She is the contact for the NHSM rule. Thank you,  
Susan Lancey

U.S. EPA Region I  
5 Post Office Square  
Suite 100 (OEP05-2)  
Boston, MA 02109  
617-918-1656

---

**From:** Hsieh, Jui-Yu  
**Sent:** Wednesday, November 20, 2013 3:20 PM  
**To:** Lancey, Susan  
**Cc:** Deabay, Elizabeth; Bird, Patrick; McDonnell, Ida  
**Subject:** RE: Pyrolysis Oil

Susan:

The following are my answers to the NH questions on NHSM rule.

1. I am not aware of any other facilities in Region 1 that are doing this operation and/or have received a determination under NHSM rule.
2. Based on NHSM rule (FR, Feb. 7, 2013), §241.2 Definitions: Clean cellulose biomass means those residuals that are akin to traditional cellulose biomass, including, but not limited to: Agriculture and forest derived biomass; urban wood; wood collected from forest fire clearance activities, trees and clean wood found in disaster debris, clean biomass from land cleaning operations, and clean construction and demolition wood. These fuels are not secondary materials or solid wastes unless discarded. From the information that the company provided in the attachments, it appears that the Pyrolysis oil is a renewable fuel oil (RFO) product derived from the above mentioned clean cellular biomass which is a non-waste under NHSM rule. Also stated in the attachments is that the Pyrolysis oil's intended use is for liquid fuel or chemical feedstock. Therefore, we believe that the Pyrolysis oil is a renewable energy product, rather than a secondary material that would require a non-waste determination under NHSM rule.

Juiyu Hsieh

RCRA Waste Management & UST Section  
EPA Region 1 (OSRR07-1)  
5 Post Office Square

Boston MA 02109  
Tel: 617-918-1646

---

**From:** Lancey, Susan  
**Sent:** Thursday, November 14, 2013 3:33 PM  
**To:** Hsieh, Jui-Yu  
**Cc:** Deabay, Elizabeth; McDonnell, Ida; Bird, Patrick  
**Subject:** FW: Pyrolysis Oil

Hi Jui-Yu,

Can you look into this question for New Hampshire? Please let me know and thank you,  
Susan Lancey

U.S. EPA Region I  
5 Post Office Square  
Suite 100 (OEP05-2)  
Boston, MA 02109  
617-918-1656

---

**From:** Beahm, Catherine [<mailto:Catherine.Beahm@des.nh.gov>]  
**Sent:** Thursday, November 14, 2013 3:02 PM  
**To:** Lancey, Susan  
**Cc:** Moore, Todd  
**Subject:** Pyrolysis Oil  
Hi Susan,

We have a vendor interested in selling pyrolysis oil in NH. Attached is a determination they submitted in which they argue the product is a fuel and thus when burned, the device in which it is burned would be covered under 40 CFR 63, Subparts DDDDD or JJJJJJ. Do you concur? Do you have any other facilities in Region 1 that are thinking of doing this and have received a determination under the NHSM rule? Also attached is a description of the product.

We believe it meets our definition of bio-oil: "Bio-oil" means a liquid fuel derived from vegetable oils, animal fats, wood, straw, forestry byproducts, or agricultural byproducts using noncombustion thermal, chemical, or biological processes, including, but not limited to, distillation, gasification, hydrolysis, or pyrolysis, but not including anaerobic digestion, composting, or incineration. This makes it exempt from our state toxics rule.

Let me know what you think. A hospital is considering converting over from #4 fuel to this product.

*Cathy Beahm*

Technical Assistance Specialist  
NH Department of Environmental Services  
Air Resources Division  
P.O. Box 95  
29 Hazen Drive  
Concord, NH 03302-0095  
phone: (603) 271-2822  
fax: (603) 271-7053  
email: [catherine.beahm@des.nh.gov](mailto:catherine.beahm@des.nh.gov)



Please consider the environment before printing this e-mail.

-----Original Message-----

**From:** [gtgosselin@aol.com](mailto:gtgosselin@aol.com) [<mailto:gtgosselin@aol.com>]  
**Sent:** Thursday, November 14, 2013 2:45 PM  
**To:** Beahm, Catherine  
**Subject:** EPA Info

Cathy,

Thanks again for meeting with me today. Attached is the information on the EPA determination. Let me know if this is sufficient.

Best Regards,

Greg